

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

**MOTION TO COMPEL REMOVAL FROM SOLITARY CONFINEMENT AND/OR
LOCKDOWN AT THE BLOUNT COUNTY DETENTION CENTER**

Comes now the Defendant, VICENTE CORONA, by and through undersigned counsel and hereby moves this Court for an Order compelling the U.S. Marshal's Service to remove defendant Corona from Solitary Confinement and/or lockdown at the Blount County Detention Center.

In further support thereof, defendant and his counsel aver:

(1) Since the 2nd week of Mr. Corona's incarceration, he has been in virtual lock-down, spending 23 hours of each day confined in a very small cell.

(2) Mr. Corona's harsh confinement is unique for pretrial detainees, and there has been no reasonable explanation given for the severe manner in which Mr. Corona is being detained pretrial.

(3) There has been mention of a rumor about discussions regarding an escape. There has been no production of any documentation to substantiate the rumor, nor has there been any effort to place Mr. Corona in general population.

(4) Mr. Corona's pretrial detention in a solitary-like and/or lock-down atmosphere amounts to cruel and unusual treatment of a pretrial detainee.

WHEREFORE, IT IS RESPECTFULLY REQUESTED that the Court Order the U.S. Marshal to show cause why Mr. Corona should not be confined with the general population during the pendency of this matter.

RESPECTFULLY SUBMITTED this 31st day of August, 2006.

DONAU & BOLT

s/ Alfred S. Donau, III
ALFRED S. DONAU, III, ESQ.
3505 North Campbell, Avenue
Tucson, Arizona 85719-2033
(520) 795-8710
skipdonau@aol.com
alma@donaubolttuccoxmail.com

RITCHIE, DILLARD, & DAVIES, P.C.

s/ Stephen Ross Johnson
ROBERT W. RITCHIE, ESQ.
WADE V. DAVIES, ESQ.
STEPHEN ROSS JOHNSON, ESQ.
606 W. Main Street, Suite 300
Knoxville, TN 37902
(865) 637-0661
srj@rddlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2006, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson
606 W. Main Street, Suite 300
Knoxville, TN 37902
(865) 637-0661
srj@rddlawfirm.com